



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET- SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: 8EPR

September 12, 2006

Libby City Council
952 East Spruce Street
Libby, MT 59923

Dear Mayor Berget and City Council Members:

The purpose of this letter is to provide the City of Libby (City) with guidance for future activities at the Former Export Plant (Site), also referred to as Operable Unit 01.

In 2001, W.R. Grace, in response to a Unilateral Administrative Order (UAO) with EPA, conducted a removal action at the Site. Following the cleanup, raw Libby Amphibole (LA) asbestos and vermiculite were found in the buildings, so EPA ordered W.R. Grace to demolish the buildings. The removal action also included excavation to a depth of 18 inches and excavation to depths of 3-4 feet in areas where the buildings once stood because of the presence of contamination. The excavated areas were replaced with clean fill material. This removal action was completed in 2002.

Between May and September 2006, EPA assisted the City with the installation of a water line transecting the Site. This water line passed below the 18" cap of clean fill into contaminated material. This clearly illustrated the need for agreed upon guidelines for work at the Site prior to a Record of Decision and a final Operation and Maintenance Plan being put in place.

The following assumptions should be made when working at the Site:

- Contaminated soil may be encountered within 12" to 18" below ground surface. Due to compaction and usage, it should be assumed that a full 18" of compacted soil will not be present over the entire site.
- Visible vermiculite left at depth may contain measurable amounts of Libby Amphibole asbestos.

Before any intrusive work begins at the Site, the following steps must be taken:

1. The City will notify an EPA representative at the EPA Information Center of the upcoming plans.
2. The EPA representative will meet with the City representative to review the plans and timeline for the activities.
3. EPA will evaluate the likelihood of encountering soil contamination. EPA will then determine if subsurface soil characterization is needed.
4. If it is determined that contaminated soils will be encountered, EPA will work with the

City to develop a work plan protective of City workers and of the environment.

It is imperative that the City notify EPA before work begins at the Site. Ample time is also required for planning purposes. If the City begins work prior to notifying EPA and contaminated soil is uncovered, significant delays to your project schedule may occur while EPA determines what steps should be taken. In addition, the City may be responsible for any costs resulting from the spread of contaminated soil on an already remediated site.

EPA encourages the City to develop your own formal policy for all intrusive work related to the former Export Plant. All employees should be aware that before work begins at the Site, communication with EPA should be the first step.

EPA would like to thank the City for your cooperation and willingness to work together. We hope the success of the water line work at the Former Export Plant will serve as a model for future activities. EPA looks forward to working with the City to put a policy in place for any future construction work at the Site.

If you have any questions, please contact Mike Cirian, EPA Remedial Project Manager at the EPA Information Center at 406-293-6194. Thanks again for your cooperation.

Sincerely,

Paul Peronard
EPA Team Leader

This will be considered an interim guideline for the City of Libby and EPA to follow until the Record of Decision (ROD) is complete for the Libby Superfund Site until approved Institutional Controls (IC) can be established.

City of Libby Mayor - Tony Berget

Date

Supervisor for City Services - Dan Thede

Date

EPA - Libby Site Manager - Mike Cirian

Date

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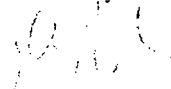
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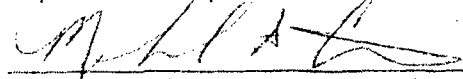
Date

6/12/07


Supervisor for City Services - Dan Thede

Date

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EPA Libby Site Manager - Mike Cirian

Date

6/12/07



REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR

May 8, 2007

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Libby, MT 59923

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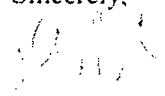
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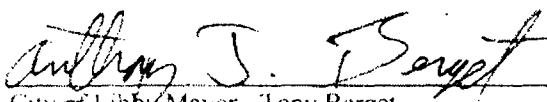
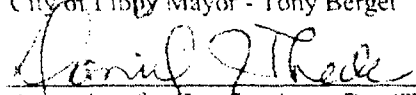
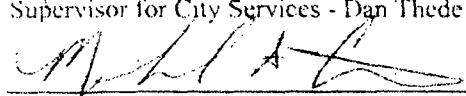
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 Supervisor for City Services - Dan Thede	Date <u>6/12/07</u>
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